## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Bankruptcy No. 13-17698-elf

TITANIA D. BODDIE, Chapter 13

Debtor, Related to Doc. No. 73

CONSUMER PORTFOLIO SERVICES, INC.,

Movant

V.

TITANIA D. BODDIE and WILLIAM C. MILLER, Ch. 13 Trustee,

Respondents

## NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

Consumer Portfolio Services, Inc., has filed a Motion for Relief from the Automatic Stay with the Court to lift the automatic stay regarding the 2015 Mitsubishi Mirage Hatchback 5D DE 1.2L I3, VIN ML32A3HJ8FH008901.

<u>Your rights may be affected.</u> You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **March 30**, **2017**, you or your attorney must do all of the following:
  - (a) file an answer explaining your position at:

Clerk, U.S. Bankruptcy Court Eastern District of Pennsylvania Robert N.C. Nix, Sr. Federal Courthouse 900 Market Street, Suite 400 Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorneys:

Peter J. Ashcroft, Esquire Bernstein-Burkley, P.C. 707 Grant Street, Suite 2200, Gulf Tower Pittsburgh, PA 15219

- 2. If you or your attorney do not take these steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on April 11, 2017 at 9:30 a.m. in the Robert N. C. Nix, Sr. Federal Courthouse, 900 Market Street, Courtroom #1, Philadelphia, PA 19107.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

By: /s/ Peter J. Ashcroft Peter J. Ashcroft, Esq. PA I.D. #87317 pashcroft@bernsteinlaw.com 707 Grant Street, Suite 2200, Gulf Tower Pittsburgh, PA 15219 (412) 456-8107

Fax: (412) 456-8135

Counsel for Consumer Portfolio Services, Inc.

Dated: March 15, 2017